



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
2890 WOODBRIDGE AVENUE
EDISON, NEW JERSEY 08837-3679

JUL 17 2012

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Luis Figueroa
President
Battery Recycling Company, Inc.
P.O. Box 1016
Arecibo, Puerto Rico 00613-1016

Re: Battery Recycling Company Stack Test Protocol and Emissions Sampling Location

Dear Mr. Figueroa:

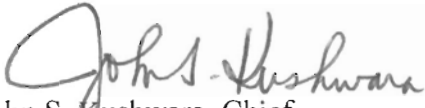
The United States Environmental Protection Agency (EPA) has reviewed Battery Recycling Company, Inc.'s (BRC's) stack test protocol, *Particulate, Lead and Visible Emissions Sampling Protocol - Combined Baghouse Stack* (Protocol), dated June 6, 2012, and received by EPA via email on June 18, 2012. The EPA also has reviewed BRC's supplemental submittal consisting of a block diagram of BRC's plant processes, several drawings, and baghouse operations monitoring data for 2010 and 2011, and received by EPA via BRC hand delivery on June 25, 2012. According to EPA's Order CAA-02-2012-1004 (Order), BRC was required to submit the protocol and the information in the supplemental submittal by May 9, 2012. A June 26, 2012, letter to BRC from EPA, requesting additional information has not been responded to. Based on a review of the information EPA has received to date, the EPA has concluded that the Protocol is not approvable and that BRC's existing emissions sampling location at the combined exhaust stack is not acceptable. The specific deficiencies are listed in **Enclosure 1** (enclosed).

Please note that **Enclosure 1** includes the original set of 13 comments (#1 through #13), dated June 25, 2012, which the EPA has previously provided BRC on June 26, 2012; the updates to Comments #1, #2, #4, and #5; and the additional comments (#14 through #17) from a review of BRC's supplemental submittal. We must emphasize that BRC has not provided EPA with a revised test protocol which addresses the original 13 comments. Therefore, all EPA comments in **Enclosure 1** need to be adequately addressed before approval can be given.

Please also note that the Order requires BRC to conduct stack test of the furnaces using an EPA-approved protocol by July 31, 2012. Therefore, it is imperative that BRC identify other suitable sampling location(s), install new test ports, substantiate the absence of cyclonic flow per applicable test methods and procedures, revise the Protocol, and provide us with the requisite information as soon as possible so that we can complete our review in time in order to have BRC conduct the required stack tests in accordance with the Order. Please call EPA by Friday, July 20, 2012 to convene a conference call with BRC's stack testing consultants to ensure that they fully understand what is expected by EPA pursuant to the Order.

If you have any questions concerning this letter, please call Héctor Vélez or Francisco Claudio of EPA's Caribbean Environmental Protection Division at 787-977-5850 or 787-977-5841, respectively. Any specific questions concerning stack testing should be addressed to Kai Tang of my staff at 732-321-4364.

Sincerely,

A handwritten signature in dark ink, appearing to read "John S. Kushwara". The signature is fluid and cursive, with the first name "John" being more prominent.

John S. Kushwara, Chief
Monitoring and Assessment Branch

Enclosure

cc: Ing. Luis Sierra Torres, Director
Air Quality Area
Puerto Rico Environmental Quality Board
P.O. Box 11488
Santurce, PR 00910

U.S. Environmental Protection Agency - Region 2
Division of Environmental Science and Assessment
Monitoring and Assessment Branch
July 17, 2012

EPA Review Comments on the Battery Recycling Company's *Particulate, Lead and Visible Emissions Sampling Protocol - Combined Baghouse Stack* (the Protocol).

The Protocol, with a cover date of June 6, 2012 was submitted to the EPA via email on June 18, 2012 by the Battery Recycling Company, Inc. (BRC), Arecibo, Puerto Rico. The PDF-version of the Protocol which EPA received has a file creation date of June 18, 2012. BRC subsequently provided the EPA with a supplemental submittal on June 25, 2012 consisting of a block diagram of its plant processes, several drawings, and baghouse operations monitoring data for 2010 and 2011. The EPA comments below represent the original set of 13 comments (#1 through #13), dated June 25, 2012, which the EPA has previously provided BRC on June 26, 2012; the updates to Comments #1, #2, #4, and #5; and the additional comments (#14 through #17) from a review of BRC's supplemental submittal.

The June 18, 2012 Protocol is not approvable, and the existing stack sampling location is not acceptable. Among other deficiencies, BRC's Protocol and its supplemental submittal do not adequately respond to the requirements set forth in Section III of EPA Order CAA-02-2012-1004 (Order). To date, BRC still has not provided EPA with a revised test protocol which addresses the original 13 comments. Therefore, all EPA comments enumerated below must be adequately addressed before approval can be given.

The Protocol appears to be a minor update to two previous protocols prepared for stack tests conducted during 2010. BRC's submittal to date continues to lack full description of its operations, facility equipment, and production processes, for EPA to conduct an informed evaluation of the proposed compliance stack tests. The EPA expects to have additional comments as more responsive material are provided by BRC; nonetheless, Protocol deficiencies identified at this time include but are not limited to the following:

1. Protocol is not responsive to the First Bulleted Item in Section III of the Order:

EPA's original comment on June 25, 2012: The EPA has repeatedly asked BRC to provide adequate facility equipment diagrams, including engineering drawing(s) of its facility and equipment from points of emissions generation, including fugitive emissions, through the end of the respective exhaust stack including but not limited to furnaces and other manufacturing equipment, baghouses, enclosures, ducts for air/emissions transport, draft-inducing fans, flow guide vanes, and process monitoring/measuring equipment. The EPA requests were made in comments emailed to BRC prior to a February 29, 2012 conference call with BRC and its counsel and test consultant, and during that conference call. BRC had committed to emailing to the EPA a PDF copy of such drawing(s) that very day, February 29, 2012. BRC has not provided such a PDF file or hardcopy of such drawing(s) since that time, or in the current Protocol submittal.

EPA's additional concerns: The manufacturing process block diagram and the stack drawings, provided in BRC's June 25, 2012 supplemental submittal, do not include the information on BRC's air pollution control system that the EPA has requested since February 29, 2012. BRC needs to show the air pollution control system from all points of emissions generation, including fugitive emissions, through the end of the respective

exhaust stack. BRC needs to indicate and identify all process monitoring and measuring equipment. BRC also needs to identify where it intends to conduct emission control hoods face velocity verification.

2. Protocol is not responsive to the Second Bulleted Item in Section III of the Order:

EPA's original comment on June 25, 2012: During the February 29, 2012 conference call, the EPA asked BRC to provide a detailed "as-built" drawing of its exhaust stack and exhaust duct work from the two baghouses to show how the flow paths are combined into the single exhaust stack. BRC was supposed to send this drawing to the EPA by March 9, 2012. BRC has not provided such a PDF file or hardcopy of such drawing(s) since that time, or in the current Protocol submittal.

EPA's additional concerns: The Combined Exhaust Stack Drawing, which was included in BRC's June 25, 2012 supplemental submittal, lacks information regarding the relative angular orientation of the two baghouse exhaust flows with respect to the baffle plate and with respect to the sampling ports. There is no information on the exhaust duct work upstream of the two draft-inducing fans. In situations where only one exhaust stream is operating, how does BRC prevent exhaust flow from the operating side flowing into and through the non-operating side? There also is no information on the interior features of the stack below the inlets. What happens to the particulates that may settle within the cavities below the respective inlets?

3. Protocol is not adequately responsive to the Third Bulleted Item in Section III of the Order:
Although the Protocol repeats the list of process stream and emissions control equipment data as information that BRC will collect during the stack test, there is no indication of what specific parameters will be measured and how they are measured and recorded.

4. Protocol is not responsive to the Fourth Bulleted Item in Section III of the Order:

EPA's original comment on June 25, 2012: During the February 29, 2012 conference call, BRC said it will look into how it can document and demonstrate representative baghouse operation, bag cleaning cycle, etc. BRC has not provided to EPA any such information since that time. The current Protocol submittal is missing the historical baghouse operation monitoring data required by the Order.

EPA's additional concerns: The summary page on Filter Bags Cleaning Operation, which was included in BRC's June 25, 2012 supplemental submittal, indicates that the duration a cleaning event for a baghouse compartment is 2.5 minutes (150 seconds). However, there is no indication of which process measurement signals or sensor condition signals to BRC's Programmable Logic Controller (PLC) are recorded and could be retrieved to document baghouse operations. The historical baghouse operation monitoring data, provided in the June 25, 2012 supplemental submittal, show conflicting information. BRC needs to adequately address the questions in Comment #14, #15, and #16, below, before an informed evaluation of baghouse operations can be made.

5. Inadequate information in Section 1.2 for EPA to specify baghouse operation during test runs:

EPA's original comment on June 25, 2012: BRC shall provide to EPA detailed information on the baghouses and their respective cleaning cycle including but not limited to: type(s) and number of bags per compartment, bag cleaning methodology, duration of cleaning cycle from the time a compartment is taken offline to the time it is put back in service, and the duration of the actual bag cleaning event. EPA will then specify to BRC those baghouse operating conditions that shall be deployed during the performance tests. EPA's determination will be consistent with 40 CFR 63.7(e)(1) and the expectation that the testing conditions will challenge to the fullest extent possible the facility's ability to meet emission limits.

EPA's additional concerns: The summary page on Filter Bags Cleaning Operation needs to be incorporated into the Protocol. BRC needs to adequately address the questions in Comments #14, #15, and #16, below. This is so that EPA could determine, from the historical data, the number of compartments that could be offline at any time for filter bags cleaning.

6. Inadequate information in Section 1.2 for EPA to specify facility operations and emissions sampling regimen during test runs: BRC shall provide to EPA detailed information on the six-hour batch process including but not limited to: timing and duration of charging activities, timing and duration of tapping activities, and the nature, duration, and capacity of all facility operations from which emissions are routed into the respective emissions control equipment. EPA will then specify to BRC those facility operating conditions and emissions sampling regimen (including but not limited to the sampling duration at a traverse point, the sequence of traverse points progression, and the sequence of visible emission observations) that shall be deployed during the performance tests. EPA's determination will be consistent with 40 CFR 63.7(e)(1) and the expectation that the testing conditions will challenge to the fullest extent possible the facility's ability to meet emission limits.
7. Inadequate test runs planned: The Order requires BRC to complete all performance testing on the air pollution control devices associated with its two furnaces (the Second and Third Furnaces). However, Table 1.1 of the Protocol indicates that only one set of three test runs is planned during the proposed three-day testing program.
8. Missing test plan information on Emission Control Hoods Face Velocity Verification: BRC indicates in Section 1.1 that it intends to conduct such face velocity verification. However, the Protocol has no further information beyond what is in this introductory paragraph.
9. Inadequate minimum sampling volume: Table 1.1 of the Protocol indicates that BRC intends to collect a minimum sample volume of 30 dry standard cubic feet (dscf) for each test run. However, the test method requirements in 40 CFR 63.547(a)(5) specify that the minimum sample volume must be 2.0 dry standard cubic meters (70 dscf) for each run.
10. Missing discussion on process data collection and documentation in Section 1.4: BRC needs to provide description of analytical, sampling, or other procedures for obtaining process stream, control equipment, process control, and programmable logic controller data. BRC will need to include these data in the Source Test Report to demonstrate representative plant and process

operations during the performance tests. Example printouts of these data need to be provided in the Protocol. These requirements are consistent with the expectations of what need to be included in a test protocol. See *Preparation and Review of Site-Specific Emission Test Plans*, Emission Measurement Center Guideline Document (GD-042), March 1999 (available from <http://www.epa.gov/ttn/emc/guidlnd/gd-042.pdf>).

11. Inadequate discussion on Sampling Point Determination in Section 2.1.1: There is no discussion on confirming that BRC's exhaust stack arrangement is free of cyclonic flow during the performance tests. More importantly, BRC provided no discussion on the effect of the "baffle" (unidentified thick vertical line depicted inside the stack as shown on the diagram labeled as "Combination Baghouse Exhaust Stack Battery") on flow characteristics and test results when only one baghouse exhaust stream is introduced into the stack. The opposing half without flow would have the effect as another settling chamber on the exhaust flow stream.
12. Missing section on Reporting and Data Reduction Requirements: See GD-042 as referenced above.
13. Missing section on Plant Entry and Safety: See GD-042 as referenced above. BRC also must provide a discussion on OSHA Lead requirements for personal protective equipment, housekeeping, and hygiene facilities for its test consultants and for regulatory agency test observers.
14. BRC's June 25, 2012, submittal of a summary of Filter Bags Cleaning Operation and partial records of Baghouse Monitoring Data prompts additional questions: The Filter Bags Cleaning Operation summary indicates that the duration a cleaning event for a baghouse chamber is 2.5 minutes (150 seconds). BRC needs to clarify the following concerns regarding its partial records of baghouse monitoring data:
 - a. The BRC records span from January 2010 through December 2011 – and not through December 2012 as suggested in BRC's cover letter dated June 22, 2012.
 - b. BRC previously conducted a stack test on its Second Furnace on February 17, 2010. However, the baghouse monitoring data from approximately 2/17/2010 12:46:12 AM through approximately 2/18/2010 10:32:43 PM are missing from BRC's supplemental submittal of June 25, 2012. BRC must submit the missing data to the EPA. BRC also must provide an explanation to the EPA for the missing data's absence in the supplemental submittal.
 - c. BRC previously conducted a stack test on its Third Furnace on June 29, 2010. However, the baghouse monitoring data from approximately 6/27/2010 4:13 PM through approximately 7/2/2010 9:04 AM are missing from BRC's supplemental submittal of June 25, 2012. BRC must submit the missing data to the EPA. BRC also must provide an explanation to the EPA for the missing data's absence in the supplemental submittal.
 - d. Much of BRC data printouts do not identify the respective Furnace/Baghouse combination. How does one distinguish the sets data for each Furnace/Baghouse combination?

- e. BRC must disclose the criteria it used to extract the information from its database(s) for the printouts. BRC needs to clarify what is included on the printouts, and what has not been included on the printouts.
 - f. The columns of data on each printout are not labeled, nor are they self-explanatory. On certain printouts, the first four columns of a line of data appear to be two sets of date and time (Date1, Time1, Date2, and Time2). Date1 and Date2 could be the same or they could be one day apart. Time1 and Time2 could differ by a few seconds, by a few minutes, or by several hours. BRC must clarify how the printouts are generated and what they represent. See Exhibit 1, for example.
 - g. Certain printouts have one set of date and time for each line of data. BRC needs to explain the change in formatting from two sets of date and time to one set of date and time. See Exhibit 1, for example.
 - h. Certain printouts have one set of time and date for each line of data. The first two columns for these lines of data seem to indicate Time and Date. BRC needs to explain the change in formatting from two sets of date and time to one set of time and date. See the last line of data in Exhibit 2, for example.
 - i. BRC must disclose the condition(s) that would trigger the recording of each line of data. On some printouts, the time difference between adjacent lines of data is approximately 10 minutes and 30 seconds. However, on other printouts, the time difference between adjacent lines of data varies from a few seconds to a few minutes. Furthermore, on some lines of data with two sets of date and time, the time difference in Time1 between adjacent lines are drastically different from the time difference in Time2 between adjacent lines. See Exhibit 1, for example.
15. Discrepant Number of Compartments in BRC Baghouses: Exhibit 3 is the printout of one page of data for “Horno #2” for 6/17/2011. Baghouse monitoring data records, for 6/17/2011 6:23:06 AM to 6/17/2011 7:08:58 AM (in the first two columns), appear to indicate that there are nine (9) modules or compartments to this particular baghouse (compartments #0, #1, #2, #3, #4, #5, #6, #7, and #8). However, BRC has previously stated that each baghouse has eight modules. BRC must clarify this discrepancy.
16. Discrepant Records for Bag Cleaning Operations: For the example printout shown in Exhibit 3, if the first two columns are interpreted to indicate the date and time of a recordable event, this particular printout would indicate that from 6:30:22 AM through 6:47:53 AM, inclusive, a period of 17 minutes and 32 seconds, all nine compartments (#0, #1, #2, #3, #4, #5, #6, #7, and #8) completed a bag cleaning event. However, if the third and fourth columns are interpreted to indicate the date and time of a recordable event, this particular printout would indicate that from 7:11:56 AM through 7:12:03 AM, inclusive, a period of just 8 seconds, all nine compartments completed a bag cleaning event. BRC must clarify what is represented in the printouts of its baghouse monitoring data.
17. New Emission Sampling Locations and New Test Ports Are Needed: In accordance with the concerns expressed in Comment #11, above, and a review of the drawings that BRC provided in the supplemental submittal, EPA finds that the existing sampling location and test ports at the combined exhaust stack are not acceptable for particulate emissions sampling. During the stack

testing of one furnace/baghouse combination, only one baghouse exhaust stream is introduced into the combined exhaust stack; however, the plenum at the other side of the baffle would have the effect as an additional settling chamber upstream of the existing test ports. This condition would introduce an unknown low bias to the particulate emissions sampling and test results. It is contrary to requirements set forth in 40 CFR 60.8(e)(1) and 40 CFR 63.7(d)(1). This is not acceptable. BRC must identify other suitable sampling location(s), install new test ports, substantiate the absence of cyclonic flow per applicable test methods and procedures, and revise the Protocol accordingly.

6/27/2010 10:18:21 AM 6/27/2010 10:21:58 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 10:07:49 AM 6/27/2010 10:21:58 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 10:01:09 AM 6/27/2010 10:21:57 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 9:57:15 AM 6/27/2010 10:21:55 AM PORCENTAJE DE EMISIONES AL 3 %. ULTIMA CASA EN LIMPIEZA # 3
6/27/2010 9:56:45 AM 6/27/2010 10:21:53 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 12 %. ULTIMA CASA EN LIMPIEZA # 6
6/27/2010 9:46:42 AM 6/27/2010 10:21:52 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 9:42:31 AM 6/27/2010 10:21:51 AM TEMPERATURA ALTA DE AIRE EN MANGAS
6/27/2010 9:36:06 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 9:25:34 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 9:14:59 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 9:04:27 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 8:58:01 AM 6/27/2010 8:58:06 AM TEMPERATURA ALTA DE AIRE EN MANGAS
6/27/2010 8:57:46 AM 6/27/2010 8:57:53 AM TEMPERATURA ALTA DE AIRE EN MANGAS
6/27/2010 8:53:52 AM 6/27/2010 8:57:52 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 8:43:18 AM 6/27/2010 8:57:50 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 8:36:14 AM 6/27/2010 8:57:49 AM TEMPERATURA ALTA DE AIRE EN MANGAS
6/27/2010 8:32:45 AM 6/27/2010 8:57:48 AM PORCENTAJE DE EMISIONES AL 2 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 8:22:44 AM 6/27/2010 8:57:47 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 8
6/27/2010 8:22:11 AM 6/27/2010 8:57:44 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 3
6/27/2010 8:20:17 AM 6/27/2010 8:57:43 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 6
6/27/2010 8:11:39 AM PORCENTAJE DE EMISIONES AL 2 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 8:01:05 AM PORCENTAJE DE EMISIONES AL 2 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 7:50:31 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 7:39:58 AM 6/27/2010 7:49:01 AM PORCENTAJE DE EMISIONES AL 2 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 7:29:28 AM 6/27/2010 7:49:00 AM PORCENTAJE DE EMISIONES AL 2 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 7:18:55 AM 6/27/2010 7:49:00 AM PORCENTAJE DE EMISIONES AL 2 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 7:18:23 AM 6/27/2010 7:49:00 AM TEMPERATURA ALTA DE AIRE EN MANGAS
6/27/2010 7:08:23 AM 6/27/2010 7:49:00 AM PORCENTAJE DE EMISIONES AL 2 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 6:57:52 AM 6/27/2010 7:48:59 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 6:47:18 AM 6/27/2010 7:48:59 AM PORCENTAJE DE EMISIONES AL 2 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 6:36:47 AM 6/27/2010 7:48:59 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 7
6/27/2010 6:34:04 AM 6/27/2010 7:48:59 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 5
6/27/2010 6:31:47 AM 6/27/2010 7:48:58 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 12 %. ULTIMA CASA EN LIMPIEZA # 8
6/27/2010 6:26:15 AM 6/27/2010 7:48:58 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 6:15:42 AM 6/27/2010 7:48:58 AM PORCENTAJE DE EMISIONES AL 2 %. ULTIMA CASA EN LIMPIEZA # 1
6/27/2010 6:05:11 AM 6/27/2010 7:48:58 AM PORCENTAJE DE EMISIONES AL 1 %. ULTIMA CASA EN LIMPIEZA # 1

Exhibit 1. See EPA Comments #14f, #14g, and #14i for example concerns regarding this baghouse monitoring data printout.

6/17/2011 5:01:10 AM 6/17/2011 7:11:37 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 5:00:31 AM 6/17/2011 7:11:36 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 4:57:28 AM 6/17/2011 7:11:36 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 4:56:59 AM 6/17/2011 7:11:35 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 4:51:59 AM 6/17/2011 7:11:35 AM PORCENTAJE DE EMISIONES AL 6 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 4:47:51 AM 6/17/2011 7:11:35 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 4:47:16 AM 6/17/2011 7:11:34 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 4:41:25 AM 6/17/2011 7:11:33 AM PORCENTAJE DE EMISIONES AL 6 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 4:37:45 AM 6/17/2011 7:11:32 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 4:30:52 AM 6/17/2011 7:11:31 AM PORCENTAJE DE EMISIONES AL 4 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 4:20:22 AM 6/17/2011 7:11:31 AM PORCENTAJE DE EMISIONES AL 5 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 4:09:50 AM 6/17/2011 7:11:30 AM PORCENTAJE DE EMISIONES AL 5 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 3:59:23 AM 6/17/2011 7:11:29 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 3:59:17 AM 6/17/2011 7:11:28 AM PORCENTAJE DE EMISIONES AL 8 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 3:51:03 AM 6/17/2011 7:11:27 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 10 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 3:48:45 AM 6/17/2011 7:11:27 AM PORCENTAJE DE EMISIONES AL 7 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 3:45:28 AM 6/17/2011 7:11:26 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 10 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 3:43:17 AM 6/17/2011 7:11:26 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 13 %. ULTIMA CASA EN LIMPIEZA # 5
6/17/2011 3:41:01 AM 6/17/2011 7:11:25 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 6 %. ULTIMA CASA EN LIMPIEZA # 3
6/17/2011 3:38:53 AM 6/17/2011 7:11:24 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 15 %. ULTIMA CASA EN LIMPIEZA # 8
6/17/2011 3:38:12 AM 6/17/2011 7:11:23 AM PORCENTAJE DE EMISIONES AL 4 %. ULTIMA CASA EN LIMPIEZA # 8
8:52:04 AM 6/17/2011 PORCENTAJE DE EMISIONES AL 6 %. ULTIMA CASA EN LIMPIEZA # 8

De 6/17/11 - 3:39:12
Hasta 6/19/11 - 23:01:44

Horno #2

Exhibit 2. See EPA Comment #14h for example concerns regarding this baghouse monitoring data printout.

6/17/2011 7:08:58 AM 6/17/2011 7:12:15 AM PORCENTAJE DE EMISIONES AL 7 %. ULTIMA CASA EN LIMPIEZA # 8 ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 7:07:13 AM 6/17/2011 7:12:12 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 7:06:15 AM 6/17/2011 7:12:11 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 10 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 7:05:49 AM 6/17/2011 7:12:11 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 7:02:22 AM 6/17/2011 7:12:10 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 7:00:58 AM 6/17/2011 7:12:09 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 7:00:47 AM 6/17/2011 7:12:08 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:58:53 AM 6/17/2011 7:12:07 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 10 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:58:25 AM 6/17/2011 7:12:07 AM PORCENTAJE DE EMISIONES AL 7 %. ULTIMA CASA EN LIMPIEZA # 8
6/17/2011 6:57:15 AM 6/17/2011 7:12:06 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:56:45 AM 6/17/2011 7:12:06 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 10 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:56:35 AM 6/17/2011 7:12:05 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 10 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:55:17 AM 6/17/2011 7:12:05 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:52:17 AM 6/17/2011 7:12:04 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:51:13 AM 6/17/2011 7:12:04 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:49:18 AM 6/17/2011 7:12:03 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:47:53 AM 6/17/2011 7:12:03 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 12 %. ULTIMA CASA EN LIMPIEZA # 8
6/17/2011 6:47:07 AM 6/17/2011 7:12:02 AM PORCENTAJE DE EMISIONES AL 8 %. ULTIMA CASA EN LIMPIEZA # 8
6/17/2011 6:46:43 AM 6/17/2011 7:12:02 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 16 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 6:46:09 AM 6/17/2011 7:12:01 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 6:45:01 AM 6/17/2011 7:12:01 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 6:43:51 AM 6/17/2011 7:12:00 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 12 %. ULTIMA CASA EN LIMPIEZA # 4
6/17/2011 6:42:41 AM 6/17/2011 7:12:00 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 2
6/17/2011 6:40:30 AM 6/17/2011 7:11:59 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 28 %. ULTIMA CASA EN LIMPIEZA # 7
6/17/2011 6:39:47 AM 6/17/2011 7:11:59 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 13 %. ULTIMA CASA EN LIMPIEZA # 5
6/17/2011 6:39:17 AM 6/17/2011 7:11:58 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 5
6/17/2011 6:38:18 AM 6/17/2011 7:11:58 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 5
6/17/2011 6:37:21 AM 6/17/2011 7:11:57 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 15 %. ULTIMA CASA EN LIMPIEZA # 3
6/17/2011 6:36:04 AM 6/17/2011 7:11:57 AM PORCENTAJE DE EMISIONES AL 6 %. ULTIMA CASA EN LIMPIEZA # 3
6/17/2011 6:33:51 AM 6/17/2011 7:11:56 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 30 %. ULTIMA CASA EN LIMPIEZA # 6
6/17/2011 6:30:22 AM 6/17/2011 7:11:56 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 1
6/17/2011 6:26:48 AM 6/17/2011 7:11:55 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:26:11 AM 6/17/2011 7:11:55 AM PORCENTAJE DE EMISIONES AL 7 %. ULTIMA CASA EN LIMPIEZA # 8
6/17/2011 6:25:43 AM 6/17/2011 7:11:55 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:24:30 AM 6/17/2011 7:11:54 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0
6/17/2011 6:23:06 AM 6/17/2011 7:11:53 AM LIMITE ALTO DE EMISIONES SOBREPASADO. PORCENTAJE DE EMISIONES AL 11 %. ULTIMA CASA EN LIMPIEZA # 0

Exhibit 3. See EPA Comments #15 and #16 for example concerns regarding this baghouse monitoring data printout.